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10 Attorneys for Defendants  
11 PLAINS ALL AMERICAN PIPELINE, L.P.  
and PLAINS PIPELINE, L.P.

12 UNITED STATES DISTRICT COURT

13 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

14  
15 GREY FOX, LLC a California limited  
liability company,

16 Plaintiff,

17 vs.

18 PLAINS ALL AMERICAN PIPELINE,  
19 L.P., a Delaware limited partnership,  
20 PLAINS PIPELINE L.P., a Texas  
limited partnership,

21 Defendants.

Case No. 2:16-cv-03157-PSG-JEM

**JOINT TRIAL WITNESS LIST**

Judge: Hon. Philip S. Gutierrez

Trial Date: July 11, 2024

Pretrial Conference: June 28, 2024

Plaintiff Grey Fox, LLC and the Defendants Plains All American Pipeline, L.P. and Plains Pipeline L.P. hereby submit the following Joint Witness List indicating those witnesses whom they expect to call at trial, either in person or by deposition.

Each party reserves the right not to call or present testimony from any particular witness. By identifying witnesses below, the parties do not agree to make a witness available for trial and the parties reserve the right to seek to exclude or otherwise object to the testimony of witnesses included herein. The order in which the witnesses are listed is not necessarily the order in which witnesses will be called at trial. Each party reserves the right to call witnesses identified by the other party. The below list does not necessarily include all of those witnesses whom the parties may call at trial for impeachment or rebuttal. Each party reserves the right to amend the time estimates.

\* Indicates that witness's testimony may/will be read from deposition transcript

**Grey Fox's Witness List**

<b>Witness Name</b>	<b>Description and Time Estimate</b>
Henry Cordova*	Corrosion Supervisor / Integrity Specialist, Plains. Mr. Cordova will testify regarding Plains' assessment of corrosion on Lines 901 and 903 and has unique knowledge of corrosion issues and concerns on Line 901 and 903.  Estimated time (direct): 2 hours
Richard Hartig*	Operations, Plains. Mr. Hartig is the Assistant Division Manager for the Operations Group and will testify regarding the interactions between the Operations Group

1		and other groups, and regarding the integrity
2		management policies in place leading up to the Spill.
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4		Estimated time (direct): 1 hour
5	Kathleen Randall*	Operations Supervisor, Santa Maria Office, Plains. Ms.
6		Randall had supervisory responsibility for Plains' Lines
7		901 and 903. She was also personally present at the Spill
8		location and immediate response. Ms. Randall will testify
9		regarding Plains' maintenance and spill response
10		procedures relating to Lines 901 and 903 and knowledge
11		of corrosion; she was also on scene at the time of the Oil
12		Spill and has knowledge of local level operations issues.
13		
14		Estimated time (direct): 2 hours
15	John Shelton*	Corrosion Manager, Plains. Mr. Shelton was responsible
16		for all aspects of corrosion issues, internal and external.
17		He ordered Mr. Cordova to stop putting comments on
18		corrosion in writing. Mr. Shelton will testify that Plains
19		was aware of increasing external corrosion leading up to
20		2015 and will testify regarding Plains' integrity
21		management policies and procedures, and the
22		coordination between the Integrity Group and
23		Engineering Group.
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25		Estimated time (direct): 1 hour
26	Robin Cunningham*	Pipeline Integrity Manager, Plains. Ms. Cunningham will
27		testify regarding Plains' Integrity Management Plan and
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1		her department's efforts to comply with integrity
2		management plan. Ms. Cunningham has unique
3		knowledge of Plains' integrity management practices and
4		was the manager responsible for the department's
5		Western US operations at the time of the Oil Spill.
6		
7		Estimated time (direct): 2.5 hours
8	Darren Palmer*	Maintenance Supervisor, Bakersfield District, Plains. Mr.
9		Palmer was the sole maintenance supervisor during the
10		relevant time period and in the relevant region for Plains.
11		Mr. Palmer will testify regarding his knowledge of Line
12		901 maintenance as the maintenance supervisor for the
13		district that included Line 901 prior to Plains' Oil Spill.
14		
15		Estimated time (direct): 0.5 hour
16	Mark Lloyd	L&P Consultants, Grey Fox. Mr. Lloyd was engaged by
17		MAZ properties to remediate the oil spill impacts on
18		Grey Fox property.
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20		Estimated time (direct): 1.5 hours
21	Chris Jacobs	Brownstein, Hyatt Farber, Schreck, Grey Fox. Mr. Jacobs
22		is a real estate attorney that works in real estate
23		acquisitions. He handles land use permitting, and
24		transaction construction-type work. He is counsel for the
25		Grey Fox property and drafted the Temporary Access
26		Agreement.
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1		Estimated time (direct): 1.5 hours
2	Dr. Kimberly	Expert on Pipeline Integrity. Ms. Kim Cameron, PhD, is
3	Cameron	Plaintiff's sole expert on pipeline integrity and control
4		room procedures. She will testify regarding Plains'
5		errors, omissions, and reckless conduct in maintaining,
6		inspecting, and repairing Line 901; performing the
7		necessary engineering analyses to understand the risks on
8		the pipeline; failing to identify and repair the failure
9		anomaly prior to the spill; and failing to recognize and
10		react to the spill in a
11		reasonably prompt manner.
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13		Estimated time (direct): 3 hours
14	Dr. Kristin Robrock	Exponent, Plains' expert on remediation.
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16		Estimated time (direct): 0.5 hour
17	PMK from Pacific	Person Most Knowledgeable will testify about the
18	Pipeline Company	required work remaining at the spill site.
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20		Estimated time (direct): 0.5 hour
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### **Plains' Witness List**

23	<b>Witness Name</b>	<b>Description and Time Estimate</b>
24	Jeffrey Dann	Mr. Dann is Plains' Director of Remediation & Special
25		Projects. Mr. Dann oversaw Plains' remediation of Grey
26		Fox's property following the oil spill and communicated
27		with Grey Fox's representatives regarding the
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1		remediation. Mr. Dann will testify regarding Plains’
2		remediation of Grey Fox’s property and the parties’
3		Temporary Property Access and Remediation
4		Agreement.
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6		Estimated time (direct): 1.5 hours
7	Dr. Kristin Robrock	Dr. Robrock is Plains’ expert regarding oil spill
8		remediation. Dr. Robrock will testify regarding Plains’
9		remediation of Grey Fox’s property following the oil
10		spill.
11		
12		Estimated time (direct): 1 hour
13	Chris Jacobs	Mr. Jacobs is a real estate attorney who served as counsel
14		for the Grey Fox property. Mr. Jacobs will testify
15		regarding Plains’ compensation of Grey Fox pursuant to
16		the parties’ Temporary Property Access and Remediation
17		Agreement.
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19		Estimated time (direct): 0.5 hours

1 DATED: June 7, 2024

MUNGER, TOLLES & OLSON LLP

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3  
4 By: /s/ Jordan D. Segall  
JORDAN D. SEGALL  
5 Attorneys for Defendants  
6 PLAINS ALL AMERICAN PIPELINE,  
7 L.P. and PLAINS PIPELINE, L.P.

8 DATED: June 7, 2024

CAPPELLO & NOËL LLP

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11 By: /s/ Lawrence J. Conlan  
12 LAWRENCE J. CONLAN  
13 Attorneys for Plaintiff  
14 GREY FOX, LLC  
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